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GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LABOR & ECONOMIC GROWTH
LANSING

KEITH W. COOLEY
DIRECTOR

Jobs, Education, and Training (JET) Plus Campus-Centered Model
Request for Proposal (RFP) Questions and Responses
October 10, 2008

Question: What is Room/Suite # and Office Hours for hand delivering JETS Plus applications? Will receipt be given to delivery person? Can application be sent by Fed Ex or registered mail and receipt documentation given?

Response: Proposals are due by 5:00 P.M. on Thursday, October 16, 2008 to:
Mr. Brian Marcotte, Welfare Reform Manager
Bureau of Workforce Transformation
Michigan Department of Labor & Economic Growth
201 North Washington Square
Victor Office Center, 5th Floor
Lansing, Michigan 48913

A date stamped receipt will be given for hand delivery. Yes, the proposal may be submitted through Fed Ex or registered mail.

Question: Do proposals have to be submitted to and reviewed by the local Michigan Works! Agency (MWA) prior to submission to the Department of Labor & Economic Growth (DLEG)?

Response: See Attachment 2 of the RFP. One of the criteria for submission requires a letter of support from the local MWA.

Question: If an organization would like to serve participants from more than one MWA (i.e. Wayne County, excluding Detroit and Wayne County - Detroit) should they submit two separate proposals or combine them in one?

Response: Separate proposals must be submitted for each area to be served.

Question: For previous demonstrated experience (bottom of page 16 of 18), do the elements that must be included in the description apply only to the applicants that do not have a current or previous JET grant?

Response: All proposals must include descriptions of experience relevant to the successful accomplishment of the JET Plus project.

DLEG is an equal opportunity employer/program.
Auxiliary aids, services and other reasonable accommodations are available upon request to individuals with disabilities.

Question: Just to reconfirm: If the subcontractor has implemented a JET contract, then data regarding experience and ATTACHMENT 8 PREVIOUS DEMONSTRATED EXPERIENCE need NOT be submitted?

Response: All proposals must include descriptions of experience relevant to the successful accomplishment of the JET Plus project.

Question: Can referrals come directly from the Department of Human Services (DHS), or should they all come through the MWA One-Stop Centers?

Response: All referrals are to come through the MWA.

Question: Is the grantee considered to be the MWA or the sub-contractor (does sub-contractor report to the grant administrator or the MWA)?

Response: The MWA is the grantee. Campus-Centered Model providers will report to the MWA.

Question: Does DLEG prefer a single contractor per MWA or multiple contractors?

Response: DLEG does not have a preference. The number of Campus-Centered Model providers is a local decision based on service capacities.

Question: What is the definition of # served? Does it mean enrolled, attended class, or does it mean employed?

Response: The definition of number served means the participants who are enrolled and receiving services, or are placed in employment through the Campus-Centered Model.

Question: Does Kent County have to serve 150 participants for the campus model?

Response: 150 participants is the target number to be served in Kent County. An MWA may have multiple sites delivering Campus-Centered Models in its area. The submitted proposals should only be for the number of people that the bidder has the capacity to effectively serve.

Question: Is the number of participants for Wayne County in fact 610 as indicated in Attachment 3 or is this an estimate?

Response: Please see RFP Attachment 3. The total number of target participants in Wayne County is 825, with 610 participants being City of Detroit residents and 215 being residents of Wayne County outside the City of Detroit.

Question: How many subcontracts do you anticipate will be awarded for Wayne County (City of Detroit)?

Response: A specific number of awards is not anticipated.

Question: Could you describe specifically what is meant by the term Campus-Based Model?

Response: See RFP Section II-B. Campus-centered models are to include academic, work, social and financial readiness components that provide remediation and adult up-skilling. The campus-centered model must have all required aspects readily available to JET Plus participants on an accessible site. The sites will provide all education and training courses, case management services, academic counseling/advising, study assistance, access to community service and/or work experience activities and work-study subsidized employment opportunities.

Question: Is individual remediation training funded under this agreement?

Response: Yes, individual remediation is funded.

Question: If remediation is required, would it be considered an additional program, which precedes entrance to the core career path offerings?

Response: No, remediation is considered a training component, and is not a separate program.

Question: The first sentence of the last paragraph on page 10 of 18 states "The campus-centered model must have all required aspects readily available to JET PLUS participants on-site". Does this mean that every activity is expected to be held under one roof?

Response: All activities must be provided on a campus site that may be one or more buildings.

Question: Must ALL training take place on-site, or can referrals be made to other existing training sites (e.g., community colleges, vocational schools, GED preparation programs) and payment made to them by the JET Plus subcontractor?

Response: Yes, all training activities must be provided at a single site (campus). Numerous providers may be contracted to deliver services on the single site.

Question: If the provider does not offer the training courses on site, are they still eligible under the guidelines for this Request for Proposal?

Response: If the provider does not offer training course on a single site they are not eligible to be a Campus-Centered Model provider.

Question: Will the case manager be on or off-site?

Response: Case managers should be accessible to clients on-site.

Question: Will a full-time case manager be assigned to the campus by DLEG?

Response: No

Question: Will the case management of JET Plus clients be conducted by the State of Michigan through DLEG, DHS, or...?

Response: Campus-Centered Model providers are to work collaboratively with the local MWA and local DHS as appropriate, to provide case management services.

Question: Will career interest be assessed by DLEG with acceptance of the Focus: HOPE current career paths (machining technologies, information technologies)?

Response: Local MWAs use Labor Market Information data to determine regionally in-demand occupations.

Question: In what industries have TANF participants been successful in finding placement?

Response: Local MWAs have historical data regarding previous placement of Temporary Assistance for Needy Families (TANF) recipients.

Question: Is business development/micro-enterprise training included as a training opportunity for this RFP? If so, do the same guidelines apply for retention?

Response: The RFP does not identify nor restrict any training programs. Local MWAs have data for regionally in-demand occupations.

Question: Should the budget cover a 12-month time frame even though the proposals are not due until October 16th?

Response: Yes. The budget should cover the JET Plus project period that is October 1, 2008 through the September 30, 2009 end date.

Question: ATTACHMENT 3-A and 3-B request the same information, with 3-A being instructions and 3-B being the format for the specific information. Are both required to be completed and submitted or just 3-B?

Response: As labeled, 3-A is instructions and guidance for completion of the 3-B budget form.

Question: Is the contractor expected to assume all responsibilities in the carrying out of the grant, or will/may the local MWA retain responsibility for some functions (such as supportive services) as they have with JET? If so, how should it be addressed in the line-item budget?

Response: Campus-Centered Model providers are expected to provide all services. Any budget reporting detail beyond what is requested for the proposal should be addressed with the MWA.

Question: Where would you put salary (wages and benefits) for staffing in this budget?

Response: See Attachment 3 Parts A and B of the RFP. Salary (wages and benefits) for staff that provides training and counseling to participants is to be reported as "Direct Client Services"

in this Budget. Expenditures for costs that include processing payroll, ordering supplies, and providing managerial oversight are to be reported as administrative costs.

Question: On attachment 3-B under the budget for JET Plus, it talks about planned expenditures. It doesn't have a detailed section for administration costs. Is there a cap on administration costs? What is the current administrative cost cap?

Response: See Section I-B of the RFP. Campus-Centered Model Provider administration expenses are not capped, however prospective providers must negotiate reasonable administrative cost levels with the partnering MWA during the development and MWA approval of the submitted proposal.

Question: Are the MWA AND subcontractor Administration costs to be included in ATTACHMENT 3-B, SECTION B, Line 6. Administration?

Response: Only subcontractor administration costs should be included.

Question: Are there limits on Administrative Costs and Profit for profit-making entities?

Response: See Section I-B of the RFP. Campus-Centered Model Provider administration expenses are not capped, however prospective providers must negotiate reasonable administrative cost levels with the partnering MWA during the development and MWA approval of the submitted proposal.

Providers are not allowed to garner any profits from the JET Plus Program.

Question: Is there a profit line item possible for for-profit bidders?

Response: Providers are not allowed to garner any profits from the JET Plus Program.

Question: If you are a for-profit company, where does the profit line go on the budgets that are not pass-through costs?

Response: Providers are not allowed to garner any profits from the JET Plus Program.

Question: Should any supportive services costs be included in grantee budget or will the MWA manage all of the supportive services dollars?

Response: Supportive services are to be included within the Grantee Budget. Campus-Centered Model providers will manage the supportive services funds.

Question: Will an advance drawing down of funds (in accordance with budget line-items) be possible? Will cash advances be allowed?

Response: Only MWAs draw cash from the State of Michigan for payments to local providers based on expenditure reports.

Question: Will progress payments be made on a MONTHLY basis (financial reports are listed as being due QUARTERLY)?

Response: Progress payment schedules are determined locally.

Question: What is the plan for funding after 9-30-2009?

Response: Funds to support this program are currently only available through September 30, 2009. There may be an opportunity for additional funding beyond that date.

Question: Should the budget reflect expenditures beyond 9-30-2009 for employment/other support services follow-up? If not, please clarify whether grantees are responsible for follow-up for participants placed at the end of one-year training programs.

Response: Budgets should reflect planned expenditures during the JET Plus project period. Funding for training beyond 9/30/2009 will be addressed at a later date.

Question: Must all performance outcomes be completed by 9/30/09?

Response: Expenditures and performance outcomes must be completed and reported to the extent possible by September 30, 2009.

Question: Is there a participant follow-up period? Will it extend beyond September 30, 2009?

Response: Follow-up services are expected to be provided during the JET Plus project period. Participant follow-up beyond September 30, 2009, will be determined based on the availability of funds.

Question: Of the 60% placement requirement, is there a certain wage or industry requirement?

Response: Specific wage levels are not required, however a priority of employment placements must be for regionally in-demand occupations as determined by the local MWA and are to support overall goals of self-sufficiency attainment.

Question: Page 11 states that 60% must be placed into employment. Will part-time employment be considered? Will internships be considered? What is the training provider's responsibility for tracking the participants' employment after placement?

Response: All employment placements must meet Federal Work Participation Requirements to be counted. Training providers are responsible for tracking participants' employment activities during the JET Plus project period.

Question: Is placement (60%) based upon those who complete a certificate program or on the number of participants enrolled in the program?

Response: Placement measurements are based on enrollments. Placements are defined as those obtaining employment.

Question: If a participant elects to enroll in a college or community college after completing a program with the initial training provider, will that be considered a successful outcome? In that instance who will be responsible for placement?

Response: If a participant elects to enroll in additional training, the initial provider is not responsible for placement, however, the continued training does not count toward the 60 percent employment placement rate.

Question: Is the training provider expected to offer placement services after the initial placement? (i.e. if the participant is fired or laid off)

Response: Campus-Centered Model providers are responsible for placement services during the JET Plus project period.

Question: Will placement be required from remedial programs?

Response: After completion of remedial programs, it is the expectation that individuals will be enrolled in training that prepares them for career employment and job placement.

Question: In the original JET Plus draft, it stated that JET Plus participants should have their high school diploma or GED before enrolling in the campus model. Is that still true for this proposal?

Response: Individuals who lack a high school diploma or GED may be referred to the Campus-Centered Model.

Question: Define Core Services. Define Core activities.

Response: Core Services and Core Activities are the same. Please see attached Bureau of Workforce Transformation (BWT) Policy Issuance (PI) 06-11, Change 5 for activity definitions.

Question: Define Non-Core Services and Non-Core activities.

Response: Non-Core Services and Non- Core Activities are the same. Please see attached PI 06-11, Change 5 for activity definitions.

Question: Define structured Community Service Program.

Response: Please see attached PI 06-11, Change 5 for activity definitions.

Question: Define work experience activities.

Response: Please see attached PI 06-11, Change 5 for activity definitions.

Question: Please explain the qualifications for community service, work experience, and work-study.

Response: All JET Plus Campus-Centered Model participants that need employment or activity hours to meet Federal work participation requirements qualify for community service, work experience and work-study.

Please see attached PI 06-11, Change 5 for activity definitions

Question: Define soft skills.

Response: The State of Michigan does not have a specific definition of soft skills, however soft skills preparation often includes classes designed to help individuals become familiar with general workplace expectations and to learn the behaviors and attitudes necessary to compete effectively in the labor market.

Question: Define deficiency in basic skills.

Response: A deficiency in basic skills is defined as math and/or literacy proficiency below a functional level as determined by recognized assessments.

Question: Section B, page 10 states that “participants served by JET Plus must meet the eligibility criteria state above and be one or more of the following...” and one of the items listed is “basic skill deficient.” How is “basic skill deficient” defined? How will this be determined?

Response: Basic skills deficiency is define as math and/or reading competencies below functional levels as determined by recognized assessments.

Question: Define allowable work subsidies to employers.

Response: See Attachment 3 Part A of the RFP. Work subsidies include payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, or training.

Question: What specifically is a work-study program, and what are its objectives?

Response: See RFP Attachment 3 Part A. Submitted proposals must include a description of how opportunities for participants to engage in subsidized employment activities on campus will be made available.

Question: Can you provide a more detailed explanation of the work-study component and how it is to be administered?

Response: See RFP Attachment 3 Part A. Submitted proposals must include a description of how opportunities for participants to engage in subsidized employment activities on campus will be made available.

Question: What are the guidelines of the work-study program?

Response: See RFP Attachment 3 Part A. Work-study programs must include opportunities for participants to engage in subsidized employment activities.

Question: Which clients are eligible for Work-study?

Response: All JET Plus Campus-Centered Model participants that need employment hours to meet Federal work participation requirements are eligible for the Work-study opportunities.

Question: What are the minimum and/or allowable payments to work-study participants?

Response: Work-study participants are to be paid the Michigan State Minimum Wage of \$7.40 for every hour of work.

Question: Who will be responsible for creating a work-study plan to assist participants in meeting work participation requirements?

Response: Campus-Centered Model providers are responsible for creating work-study plans with each participant.

Question: Is a 40-hour week required of all participants? If so, what allocation of a basic 40- hour workweek is assigned to the following activities: Classroom Training, Community Service, and Work Study?

Response: No. All participants must be meetings Federal Work Participation Requirements as outlined the attached PI 06-11, Change 5.

Question: Define assessment; does it include academic, emotional and dependencies (drug, alcohol and other)?

Response: Campus-Centered Model providers are to work collaboratively with the local MWA and DHS as appropriate, to conduct academic and other assessments of individuals' readiness for training. JET Plus has not been designed to have special services or supports to serve individuals with significant substance abuse and mental health issues.

Question: Will all participants be prescreened according to the training provider's admission criteria?

Response: No, the expectation is that Campus-Centered Model providers will work collaboratively with the local MWA and DHS to identify referrals for training services.

Question: What standards of measure will be used to determine the participants' reading and math levels?

Response: The Campus-Centered Model Provider may conduct their own assessments or they may utilize the assessments conducted by the local MWA or Department of Human Services (DHS) office.

Question: Will all clients be subject to Focus: HOPE's standard student management process (drug and medical screening, student policies in student handbook, completion of TABE educational assessment)?

Response: No. The expectation is that appropriate individuals will be referred to the Campus-Centered Model provider through collaboration with the MWA and DHS.

Question: Will there be a requirement for a separate student database/record management system?

Response: A separate student database is not required. All JET Plus participants' records must be tracked through the MWA's One-Stop Management Information System (OSMIS).

Question: Who will have the responsibility of monitoring and reporting program performance?

Response: MWAs have the responsibility of monitoring and reporting program performance.

Question: If an organization has a special niche, can they propose to serve primarily individuals who qualify for JET services but fall within the agencies special niche or should the program be open to all?

Response: JET Plus Campus-Centered Model services should be available to all referrals.

Question: If you are providing several occupational training programs, how should the money for the programs be calculated? Based on expected # of students for each program?

Response: Funding for training programs is based on the actual costs associated with each training program.

Question: If it is based on the # expected to be served that could drive the cost per service very high if the training program is expensive. Will the raters of the Bid take that into consideration when they don't have the cost for each individual program?

Response: The training program expenses that Campus-Centered Model bidders propose are to fall within the identified limits for the No Worker Left Behind Program.

Question: Is there a cap on the amount that can be spent for occupational training? i.e. Some MWAs have a \$3,000 cap for JET participants that want training.

Response: The \$5,000/year for two years limits and guidelines identified for the No Worker Left Behind Program apply to JET Plus.

Attachment



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E-mailed: 10/01/08 (be)

**Bureau of Workforce Programs/Transformation (BWP/BWT)
Policy Issuance (PI): 06-11, Change 5**

Date: October 1, 2008

To: Michigan Works! Agency (MWA) Directors

From: Liza Estlund Olson, Director, Bureau of Workforce Transformation (**SIGNED**)

Subject: Allowable Activities in Meeting Work Participation Requirements

Programs Affected: Jobs, Education, and Training (JET)

Rescissions: PI 01-38 and changes

References: Reauthorization of the Temporary Assistance for Needy Families (TANF) Program; Final Rule: *45 CFR Parts 261, et al.*, Federal Register, Volume 73, Number 24, February 5, 2008

Reauthorization of the TANF Program; Interim Final Rule: *45 CFR Parts 261, et al.*, Federal Register, Volume 71, Number 125, June 29, 2006

TANF Program; Final Rule: *45 CFR Part 260 et al.*, Federal Register, Volume 64, Number 69, April 12, 1999

Workforce Investment Act (WIA) of 1998: 20 CFR 652 et al., Final Regulations, Subpart B, Section 663.700-663.710

Section 403(b)(5) of the Social Security Act

State of Michigan Work Verification Plan, Effective October 1, 2008

DLEG is an equal opportunity employer/program.
Auxiliary aids, services and other reasonable accommodations are available upon request to individuals with disabilities.

Background: This policy defines and updates the State of Michigan's JET Program allowable work participation activities in accordance with updated federal regulations. These regulations are stipulated in the *Reauthorization of the TANF Program; Final Rule*, dated February 5, 2008. The effective date of the *Reauthorization of the TANF Program; Final Rule* and this policy is October 1, 2008. The Final Rule replaces the Interim Final Rule, dated June 29, 2006, which guided previous directions. Changes to this policy include: the conversion of Job Search/Job Readiness time limits to an hourly equivalent; allowing participation in bachelor's and advanced degree programs to count as Vocational Educational Training; and allowing up to an hour of unsupervised study time for each hour of class time to be counted towards participation requirements.

Policy: The JET Program is designed to establish and maintain a connection to the labor market for individuals referred from the Michigan Department of Human Services (DHS), Non-Custodial Parents (NCPs), and Non-Cash Recipients (NCRs), while offering educational and training opportunities and Job Search/Job Readiness (JS/JR) activities to increase the participant's income, therefore, reducing or eliminating a family's need for public assistance.

As recipients of federal funds, MWAs and their service providers are required to comply with various regulations relating to non-discrimination, equal opportunity (EO), and inclusion. The most critical of these regulations are:

- Implementation of the Nondiscrimination and EO Provisions of the WIA of 1998;
- Section 504 of the Rehabilitation Act of 1998, as amended;
- Titles I and II of the Americans With Disabilities Act (ADA); and
- The ADA Accessibility Guidelines or the Uniform Federal Accessibility Standards.

In addition, priority will be given to assuring that throughout the system persons with physical, mental, cognitive, and sensory disabilities will have programmatic and physical access to all Michigan Works! Service Center's services and activities. The commitment to adequately serving persons with disabilities extends beyond the specialized services of vocational rehabilitation.

To ensure a universally accessible and inclusive system, each local service area is encouraged to embrace the overall philosophy of Michigan's One-Stop Inclusion Workgroup Final Report.

For all activities, a reasonable workplace/training environment must be provided and must comply with applicable health and safety standards. All

work/training placements must be non-discriminatory in nature and provide EO for all participants.

The primary focus of the JET Program is to assist participants with reducing their dependence on public assistance and movement toward increased self-sufficiency. This is to be accomplished through participation in core and non-core activities as outlined in this policy issuance and in Michigan’s Work Verification Plan. Life-skills instruction, training or education, and other work-readiness activities that promote employability skills may also be utilized.

Although it is the expectation that MWAs place a majority of participants into activities that comply with meeting federal work participation requirements, MWAs have the flexibility to place a limited number of eligible participants into extended education/training activities that may conform to the *No Worker Left Behind Program*. Such placements should lead to the elimination of dependency on public assistance.

Participation in the subsequently described activities can begin upon an individual’s referral to an MWA. Unlike previous program requirements, participants are not required to test the labor market prior to placement in other JET activities.

The DHS establishes the minimum required hours of participation for each individual upon referral to the MWA based upon appropriately corresponding federal and state criteria. The federal minimum required weekly hours for each family size are as follows:

Single-parent family <u>with</u> a child under the age of six	20
Single-parent family <u>without</u> a child under the age of six	30
Two-parent family <u>not using</u> federally funded child day care	35
Two-parent family <u>using</u> federally funded child day care	55

MWAs have the flexibility to require hours of participation beyond federal minimum requirements when appropriate. Ultimately, however, MWAs must focus on ensuring that as many participants as possible are meeting federal participation requirements, in order for Michigan to meet the overall participation rate required to avoid significant federal fiscal penalties.

MWAs must have single parent families (with or without a child under the age of six) who are assigned to JET complete 20 hours of participation each week in at least one of the eight “core activities” described in this policy to be counted as meeting federal participation requirements. For two-parent families *not* receiving federally funded child day care assistance, a total of 30 hours per week of the required 35 hours per week must be spent participating in core activities. For two-parent families that *are* receiving federally funded child day care assistance, a total of 50 hours per week of the required 55 hours per week must be spent participating in core activities. Any remaining hours of the

weekly participation requirement may be met through participation in “non-core activities” or core activities. The core or non-core designation of each activity is included in its description.

Actual hours of participation are averaged over the course of a reporting month to determine participation rates. For example, in a four-week month, a participant with a 20-hour per week participation requirement who completes 30 hours of core activities per week for two of the weeks and 10 core hours per week for the remaining two weeks (an average of 20 core hours per week) will be considered to have met their federal participation requirement for that reporting month. The beginning and end dates for the reporting months will be included in monthly Data Validation requests.

NCRs and NCPs are not subject to federal participation requirements and will not be included in the federal participation rate. NCPs shall participate for the number of hours required by the Friend of the Court. The MWA shall develop an Individual Service Strategy in consultation with each NCR participant to determine each NCR’s hours of participation.

The guidelines established in this policy issuance, along with the accompanying attachment, are to be used to ensure that work participation requirements are being met in accordance with federal and state standards.

Allowable Activities

JET uses the definitions and guidelines for the allowable activities as outlined in the *Reauthorization of the TANF Program; Final Rule*, and subsequently described in Michigan’s Work Verification Plan. The allowable activities are identified and defined following the guidelines listed below.

Appropriate assessments and evaluation must be developed and conducted in conjunction with the DHS. Participation in basic skills education may only be counted under the following allowable activities: Job Skills Training Directly Related to Employment (non-core); Education Directly Related to Employment (non-core); or Vocational Educational Training (VET) (core). Please note that basic skills education may only be counted as VET *if* the basic skills education is embedded as a minor element of the VET Program, and is deemed to be necessary by the educational institution, which must provide supporting documentation for its need. Participants in basic skills education programs must meet the required minimum number of hours in core activities to meet participation requirements.

Case management procedures including entry of actual hours of participation into the One-Stop Management Information System, documentation requirements for substantiating actual hours recorded, and guidelines regarding excused absences may be found in BWT PI 06-34 and its changes.

The allowable activities are as follows:

1. **Unsubsidized Employment** is a Core Activity. This means full- or part-time employment in the public or private sector that is not supported by TANF or state General Fund/General Purpose (GF/GP) funds or any other public program. Participation in unsubsidized employment is the fundamental goal for all JET Program participants to prepare them for self-sufficiency and public assistance case closure.

Self-employment may count as unsubsidized employment. Self-employment may include, but is not limited to, domestic work and the provision of childcare. The following formula must be used to determine if a self-employed participant meets or exceeds required minimum hours of employment necessary to report as unsubsidized employment.

- Monthly net business sales (gross revenues – expenses) divided by the federal minimum wage = total monthly hours.

The weekly calculated average hours must equal or exceed the minimum required hours of participation.

Hours of participation in barrier removal or other supportive activities, such as substance abuse treatment, mental health treatment, and rehabilitation activities may count as unsubsidized employment if the activities are an integrated part of the unsubsidized employment and if the participant is paid for all hours of participation in such activities.

Guidelines used for determining allowable self-employment activities and allowable self-employment expenses must be consistent with the countable self-employment income guidelines used by the DHS in determining TANF eligibility. These guidelines can be found in DHS Program Eligibility Manual 500, at:

<http://www.mfia.state.mi.us/olmweb/ex/pem/500.pdf>.

2. **Subsidized Private and Public Sector Employment** is a Core Activity. This is employment for which the employer receives a subsidy from TANF or GF/GP funds to offset some or all of the wages and costs of employing a participant. Work-study programs sponsored by educational institutions may be included in this activity.

While there is no time limit to this activity, it is to be used only on a limited basis for placement of participants who may have barriers to employment. Subsidized private or public sector employment allows an employer the opportunity to observe how the participant functions in a

work environment. Participants in this activity must be supervised on an ongoing basis, no less frequently than once each day in which the individual is scheduled to participate.

While a participant is enrolled in this activity, the MWA must provide the necessary supportive services to ensure that the participant is able to successfully complete the probationary period.

Subsidized private or public sector employment may be arranged directly through the employer or through a placement agency. TANF, GF/GP, or other funds may be used to reimburse the employer for the actual wages or salary earned by the participant. The subsidy is not to be used to provide fringe benefits.

Hours of participation in barrier removal or other supportive activities, such as substance abuse treatment, mental health treatment, and rehabilitation activities may count as subsidized employment if the activities are an integrated part of the subsidized employment and if the participant is paid for all hours of participation in such activities.

If the DHS closes the participant's Family Independence Program (FIP) case, and the placement of the participant into this activity was the result of efforts made by the MWA, the participant may remain in this activity for the remaining balance of their limitation under the JET Program.

3. **On-the-Job Training (OJT)** is a Core Activity. This activity consists of training in the public or private sector that is given to a paid employee while he or she is engaged in productive work. The training should provide the knowledge and skills essential to the full and adequate performance of the job. Any paid training, whether provided off-site or at the work-site may be considered an OJT.

Participants receiving OJT will normally have contractual training periods. An OJT contract must be limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided. In determining the appropriate length of the contract, consideration should be given to the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, and the participant's individual employment plan. Reimbursement of training costs may be provided to the employer from external funding sources, which may cover up to 50 percent of a participant's salary. All participants must be supervised by an employer, work site sponsor, or other responsible party no less frequently than once each day in which the individual is scheduled to participate.

In the event of TANF case closure, payment may continue to be paid to the employer until the OJT contract expires or is terminated by any party. The OJT standards under Subpart B, Section 663.700 through 663.710 of the Federal WIA Regulations will apply for all JET participants. An employer, work site sponsor, or other responsible party must supervise OJT daily.

4. **Job Search and Job Readiness (JSJR) Assistance** is a Core Activity. This activity consists of the act of seeking or obtaining employment, preparation to seek or obtain employment, including life skills training, and substance abuse treatment, mental health treatment, or rehabilitation activities. JSJR activities must be supervised by the MWA or other responsible party on an ongoing basis no less frequently than once each day in which the individual is scheduled to participate.

The “Job Search” aspect means “the act of seeking or obtaining employment,” which should encompass all reasonable job search initiatives. Job searching includes making contact with potential employers by telephone, in person, via the Internet, submitting resumes or e-mail applications to apply for job openings and/or vacancies, and interviewing for jobs.

“Job Readiness” involves any activity that prepares individuals to obtain and maintain employment. This entails activities that assist participants in becoming familiar with general workplace expectations, and learning behaviors and attitudes necessary to compete in the labor market. This includes preparing resumes or job applications, training in interviewing skills, instruction in work place expectations, and training in effective job seeking. Please note that personal activities such as seeking childcare, seeking housing, or seeking transportation are **not** countable work activities under JS/JR or any other allowable activity.

Job Readiness may also involve substance abuse treatment, mental health treatment, or rehabilitation activities. In order to count such activities as part of JSJR, a qualified medical, substance abuse, or mental health professional, must provide written documentation of the need for participation in such activities.

Travel time between interviews may be counted as JSJR participation time, but not the travel time to the first job search interview or the time spent returning home after the last one.

As with all allowable activities, hours spent in substance abuse treatment, mental health treatment, or rehabilitation activities must be documented. If an individual does not have a sufficient number of hours of participation in substance abuse treatment, mental health treatment, or rehabilitation

activities alone to comply with his/her required number of work participation hours, a participant must combine the substance abuse treatment, mental health treatment, or rehabilitation activities with other allowable activities to meet their work participation requirement.

An individual's participation in JSJR assistance can count for a maximum of 12 weeks in the preceding 12-month period (a rolling 12-month period), of which no more than 4 weeks may be consecutive. Because Michigan is considered a "needy" state at the time of this PI, its JSJR time limits are 12 weeks per preceding 12-month period, versus 6 weeks per preceding 12-month period for non-"needy" states. A state can qualify as a needy state based on its unemployment rate, or based on increases in its Food Stamp caseload {see Section 403 [b][5] of the Social Security Act}).

The 12-month period starts anew beginning September 28, 2008, the beginning date of the October 2008 reporting period, for participants who have already completed any participation time in JSJR. The 12-month period begins on the first date JSJR actual hours are entered.

For the purposes of the 12-week limit, a week is defined as 20 hours for a participant who is a single custodial parent with a child under age six, and is defined as 30 hours for all other participants. Thus, a maximum of 240 hours of JSJR per preceding 12-month period may be counted toward the participation requirements of single custodial parents with a child under age six, and a maximum of 360 hours of JSJR may be counted toward the participation requirements of all other individuals. Thus, JSJR activities may be distributed over time, as opposed to previous federal regulations that required any time spent during a week in JSJR to be counted as one full week of the 12-week limit.

Please note that a maximum of 360 JSJR hours per preceding 12-month period may be counted for each work eligible individual in a two-parent family. The total hourly JSJR time countable for a two-parent family may not be combined and applied to one parent (i.e. one parent may not do all 720 JSJR hours).

Please note that for the purposes of the four-week limit on consecutive participation in JSJR, a week is the seven-day period from Sunday through Saturday. Thus, in terms of the four-consecutive week limit, *any* amount of time spent participating in JSJR during a week would exhaust one full week of the four-consecutive week JSJR time limit. If an individual participates in JSJR activities for four consecutive weeks, subsequent JSJR activities may not begin to count again

towards the individual's federal participation requirement until one full week after the end of the fourth consecutive week of JSJR.

Hours of participation in JSJR in fifth consecutive weeks will not be counted towards participation requirements, nor be applied towards the individual's 240/360 hour 12-month limit.

For example, if a single parent with a child under age six (a 20 hour per week federal participation requirement) participates in ten hours a week of JSJR time, these JSJR hours could be spread over 29 calendar weeks in a twelve-month period, before reaching their 240 hour limit.

Hours of participation in JSJR in fifth consecutive weeks and hours of participation in JSJR that exceed the individual's total number of countable hours per twelve month period will not be counted towards the individual's participation requirements. Participation in another core activity would be required in order for the individual to meet federal participation requirements.

JSJR hours in a month that do not satisfy participation requirements will still be applied towards the individual's total number of countable hours for the 12-month period.

Participation time spent in JSJR prior to an individual becoming a FIP recipient will not count towards the participant's JSJR time limit.

Michigan Works! case management staff is required to supervise JSJR activities no less frequently than once each day in which the individual is scheduled to participate. In order to count job search activities that a participant engages in **outside of the MWA service center or other MWA service provider location**, participants must maintain a daily record of all employers visited in person or contacted via telephone, fax, or Internet, and must list the time spent engaged in making the contacts. The record must include the name and location of the employer, and the name and telephone number of the person who received the employment application or who handled the job search contact. The MWA must conduct random reviews of the listed employers on each job search record submitted by the participant (one of which should be submitted no less than every two weeks) to ensure the validity of the reported participation hours. If travel time between interviews is included in reported JSJR time, the MWA must verify that the time is an accurate representation of the time required to travel between the locations.

The JSJR participation time must be tracked by the MWA to ensure that countable participation time limits are not exceeded. The One-Stop

Management Information System (OSMIS) will provide a warning when reported JSJR time approaches the participant's hourly limit for the 12-month period and if more than four consecutive weeks of JSJR are entered. Total JSJR participation time recorded may also be found on the Family Self-Sufficiency Plan (FSSP).

Please note that actual hours spent in JSJR that exceed countable time limits may be counted as excused absences if the participant's excused absences have not been used for the month.

Caution should be used in reporting hours of JSJR above participants' weekly federal participation requirements. Reported hours of JSJR that are over the participant's core federal participation requirement will still exhaust hours of the participant's 240/360 hour limit for the 12-month period. In addition, reported hours of JSJR that are above the participant's total number of countable JSJR hours (240/360) for the 12-month period will still subtract time from a participant's total annual countable JSJR participation time in future 12-month periods, due to the rolling 12-month period.

As stated above, MWAs should use caution in reporting JSJR participation hours. However, MWAs should be informed that JSJR hours that are not countable in a month (JSJR hours over the individual's 240/360 hour annual limit and JSJR hours that occur during the fifth consecutive week) will still be collected and may be beneficial in federal assessments of the state's overall work participation status, as these hours contribute information about the overall engagement levels of participants.

5. **Work Experience** is a Core Activity. A Work Experience Program (WEP) is an unpaid work assignment, performed in return for welfare. This activity is usually best suited for individuals lacking previous employment experience and/or Job Readiness skills which prohibit direct placement into Unsubsidized Employment. The goal of the WEP is to improve skills, attitudes, and the general employability of these individuals. This activity may include work associated with the refurbishing of publicly assisted housing. WEPs may be created with public sector, private sector, community-based, faith-based, or nonprofit employers or work site sponsors. If participants are placed into sites with faith-based or political organizations, participation must be voluntary on the part of the participant, and the work activity must be nonsectarian and nonpartisan in nature. Participants in this activity must be supervised on an ongoing basis, no less frequently than once each day in which the individual is scheduled to participate.

WEP assignments are not intended to create employee-employer relationships. The program is intended to benefit participants by providing

them with short-term, on-site work experience, which will add to their appeal as potential employees and help them maintain employment once job placement has occurred.

The MWAs shall periodically evaluate the effectiveness of WEP assignment(s) to assess the participant's readiness for full-time Unsubsidized Employment.

A work site sponsor, or other responsible representative, is required to supervise WEP participants' daily assignments. Also, local case management staff must maintain daily attendance reports to ensure participants are meeting federal work participation requirements.

Sites for all WEP assignments shall be approved by the MWAs. The MWAs must negotiate the terms for placement of participants at WEP sites in terms of the participants' employment and training objectives.

A participant's combined monthly hours of participation in WEPs and Community Service Programs (CSPs) may not exceed the amount of cash assistance the participant receives per month divided by the state's minimum wage, in accordance with the Fair Labor Standards Act (FLSA). The OSMIS will provide a warning if the combined actual hours entered for WEP participation and CSP participation in a month exceed the number of allowable hours determined by the above formula. If the allowable monthly hours of WEP/CSP do not satisfy the participant's monthly core activity participation requirements, a core activity other than WEP or Community Service Programs (CSPs) must be used to meet the remainder of the core activity participation requirement.

The State of Michigan is the worker's compensation insurer for FIP clients while they are assigned to work-related activities through the MWA, per DHS Program Eligibility Manual 232.

6. A **Community Service Program (CSP)** is a Core Activity. CSPs must be structured programs in which individuals perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. CSPs must be designed to improve the employability of participants otherwise unable to obtain full-time employment. Time counted in CSPs may include training that is an integral, embedded part of the CSP and of limited duration. Participants in CSPs must be supervised on an ongoing basis, no less frequently than once each day in which the individual is scheduled to participate.

The CSP sites shall be approved by MWAs. The MWAs shall negotiate the terms of the placement of participants at community service sites. An MWA shall take into account, to the extent possible, the prior training,

experience, and skills of a participant in making appropriate community service assignments.

An MWA shall only place participants into nonsectarian or nonpartisan activities. If participants are placed into sites with faith-based or political organizations, participation must be voluntary on the part of the participant, and the work activity must be nonsectarian and nonpartisan in nature. An evaluation must be done periodically in order to assess the effectiveness of participants' enrollments in CSPs.

A participant's combined monthly hours of participation in CSPs and WEPs may not exceed the amount of the cash assistance the participant receives per month divided by the state's minimum wage, in accordance with the FLSA. The OSMIS will provide a warning if the combined actual hours entered for CSP participation and WEP participation in a month exceed the number of allowable hours determined by the above formula. If the allowable monthly hours of CSPs/WEPs do not satisfy monthly core activity participation requirements, a core activity other than CSP or WEP must be used to meet the remainder of the core activity participation requirement.

The State of Michigan is the worker's compensation insurer for FIP clients while they are assigned to work-related activities (including CSPs) through the MWA, per DHS Program Eligibility Manual 232.

7. **Providing Childcare Services to an Individual who is Participating in a Community Service Program** is a Core Activity. This consists of providing childcare to enable another participant to participate in a CSP. This is an unpaid activity and must be a structured program designed to improve the employability of individuals who participate in it. Participants in this activity must be supervised on an ongoing basis no less frequently than once each day in which the individual is scheduled to participate.

Childcare provided to participants in other activities typically involves payment for services rendered and is classified as unsubsidized employment. Case managers must ensure the activity is effective in helping move the childcare provider toward self-sufficiency. Training, certification, or mentoring will help make the activity meaningful and may be a first step toward the participant's attainment of employment in the childcare field.

Participants providing the childcare services must collect written certification in accordance with the documentation requirements stipulated in PI 06-34 and subsequent changes to document that childcare services were actually provided by them for someone engaged in CSP activities.

This documentation must be collected by the MWAs in order to verify the hours of participation for individuals providing the childcare. The hours should be cross-referenced with the CSP activity verification to ensure accuracy.

8. **Vocational Educational Training (VET)** is a Core Activity. A maximum of 12 months of participation in this activity per participant per lifetime can be counted towards federal participation requirements. This 12-month lifetime limit applies to any hours of participation in the activity that are reported as actual hours during the month, regardless of whether the participant has enough hours to count in the work participation rate. Time limits do not start anew with the implementation of the Reauthorization of the TANF Final Rule. Any time that a recipient has spent in VET since the start of the Work First/JET program applies towards the 12-month lifetime limit.

VET is outlined in the following categories: Vocational Occupational Training; Condensed Vocational Training; and Internships, Practicums, and Clinicals. These activities are organized educational programs that are directly related to the preparation of individuals for employment in current or emerging occupations. Participation time in a baccalaureate or advanced degree program may be included in this activity. VET programs should be limited to activities that provide individuals the knowledge and skills to perform a specific trade, occupation, or other particular vocation. Any and all VET must be occupationally relevant and in demand as determined by the MWA. Participants in VET must be supervised on an ongoing basis no less frequently than once each day in which the individual is scheduled to participate.

Please note that baccalaureate and advanced degree programs may also be defined as the non-core activity, Job Skills Training Directly Related to Employment. Defining participation in baccalaureate and advanced degree programs as Job Skills Training Directly Related to Employment would avoid exhausting time in the 12-month VET limit (although the time would not be countable as a core activity).

All vocational educational training must be provided by education or training organizations. Such organizations include vocational-technical schools, public and private universities and colleges, community colleges, postsecondary institutions, proprietary schools, non-profit organizations, and secondary schools that provide facilities for a vocational educational provider's use.

VET activities may include basic and remedial education and English-as-a-Second Language (ESL) components. The educational or training organization providing the services must determine such activities to be a

necessary part of the training, and provide supporting documentation for its need. Such education must be embedded within the VET activity as a minor element of the program.

Up to one hour of **unsupervised** study time for each hour of class time in Vocational Occupational Training or Condensed Vocational Training may be counted towards participation requirements. **Supervised**, related study time for Vocational Occupational Training or Condensed Vocational Training may also be counted towards participation requirements. Total study time (including unsupervised and supervised time) counted towards participation cannot exceed the hours required or advised by the particular educational program. If the MWA opts to count study time towards participation requirements, it must obtain documentation from the educational institution stating the homework/study expectations of the program to ensure that reported participation time does not exceed those hours. For example, an individual who is enrolled in a vocational educational training program that consists of four hours per week of classroom seat time, whose educational institution recommends three hours per week of study time per credit hour/classroom hour, may not count more than 12 total hours of study time (no more than four of which may be unsupervised) towards their participation requirement.

In order to be counted towards participation requirements, supervised study time must be supervised in a formal study hall at the MWA or the educational institution, where an MWA staff person or appropriate representative of the educational institution can verify the participant's hours of study on a timesheet.

A standard for measuring progress should be developed by the training/educational institution in order to monitor participants' progress. Progress should be judged by mediums such as progress reports, report cards, grade point average, or a time frame within which a participant is expected to complete such education.

VET participation time must be tracked by the MWA to ensure that the 12-month lifetime limit on countable VET participation time is not exceeded. Total VET participation time recorded may be found on the FSSP.

Please note that VET activities that meet the definitions of other activities may be defined as such, in order to maximize countable participation time. For example, clinical training in a hospital that is part of a licensed practical nurse training program could meet the definition of a CSP or WEP and be categorized as such, to avoid exhausting time from the 12 allowable months of VET.

Please note that any amount of VET time reported in a month will be counted as one month of the 12-month lifetime VET limit. Thus, if the 12-month lifetime limit of VET has not yet been exceeded, and VET hours of participation in a month are minimal, it may not be in the participant's best interest for the MWA to report those hours, so as to not expend a month of the participant's VET 12-month lifetime limit (unless those hours were required for the person to meet their participation requirement that month).

Hours of participation spent in VET that have *exceeded* the VET 12-month lifetime limit should be reported on the OSMIS, despite not counting towards participation requirements. This information will be collected and may be beneficial in federal assessments of the state's overall work participation status, as these hours contribute information about the overall engagement levels of participants.

Please note that actual hours spent in VET that exceed the 12-month lifetime limit may be counted as excused absences if excused absences have not been used for the month.

- A. Vocational Occupational Training (VOT) - An occupationally relevant training component, directly related to a specific occupational field or specific job, which may combine classroom, laboratory, and other related activities.

Distance learning may be counted as part of this activity. Such time must be documented and verified as time in which progress was made, and must be in accordance with all documentation requirements specified in detail in case management PI 06-34 and changes.

Any participation time in this activity exceeding 12 months per individual may not be counted towards federal participation requirements.

- B. Condensed Vocational Training (CVT) - A short-term (not to exceed six months) vocational training program requiring a minimum of 30 hours of classroom seat time per week. The MWA must determine that a CVT is occupationally relevant and in demand. Participants must also demonstrate sufficient progress in the program as determined by the MWA.

In cases where a CVT lasts less than six months, the participant is eligible for enrollment in one additional CVT for a combined period not to exceed a total of 12 months.

- C. Internships, Practicums, and Clinicals - Full-time internships, practicums, or clinicals required by an academic or training institution for licensure, professional certification, course credit, or degree completion. The program

must be occupationally relevant and in demand as determined by the MWA. Participants must also demonstrate sufficient progress as determined by the MWA.

The length of time for which a participant may be enrolled in this activity shall be limited to the educational institution's requirements for completion of the associated program. Any participation time in this activity exceeding 12 months per individual may not be counted towards federal participation requirements.

Internships, practicums, and clinicals that consist of unpaid activities in the private or public non-profit sector that directly benefit the community serving a useful purpose may be defined as a CSP. Should an MWA define an Internship, Practicum, or Clinical as a CSP, all conditions of CSPs must be adhered to.

9. **Job Skills Training Directly Related to Employment** is a Non-Core Activity. It consists of training and education for job skills required by an employer to provide individuals with the abilities to obtain or advance in employment or adapt to changing workplace demands. Job skills training can include customized training to meet the needs of a specific employer or it can be general training that prepares individuals for employment. This can include literacy instruction or language instruction when such instruction is explicitly focused on skills needed for employment or combined in a unified whole with job training. Job skills training directly related to employment should be supervised on an ongoing basis, no less frequently than once each day in which the individual is scheduled to participate.

Baccalaureate and advanced degree programs may be defined as Job Skills Training Directly Related to Employment. Such programs must be applicable to an occupation that the MWA has determined to be in-demand.

Up to one hour of **unsupervised** study time for each hour of class time may be counted towards participation requirements. **Supervised**, related study time may also be counted towards participation requirements. Total study time (including unsupervised and supervised time) counted towards participation requirements cannot exceed the hours required or advised by the particular educational program. Where the MWA opts to count study time towards participation requirements, it must obtain documentation from the educational institution stating the homework/study expectations of the program to ensure that reported participation time does not exceed those hours. For example, an individual who is enrolled in a training program that consists of four hours per week of classroom seat time, whose educational institution recommends three hours per week of study time per credit hour/classroom hour, may not count more than 12 total hours of study time

(no more than four of which may be unsupervised) towards their participation requirement.

In order to be counted towards participation requirements, supervised study time must be supervised in a formal study hall at the MWA or the educational institution, where an MWA staff person or appropriate representative of the educational institution can verify the participant's hours of study on a timesheet.

Distance learning may be counted as part of this activity. Such time must be documented and verified as time in which progress was made, and must be in accordance with all documentation requirements specified in detail in case management PI 06-34 and changes.

Participants must also participate in the required minimum number of hours of core activities in order to meet minimum federal participation requirements.

A standard for measuring progress should be developed by the training/educational institution in order to monitor participants' progress. Progress should be judged by mediums such as progress reports, report cards, grade point average, or a time frame within which a participant is expected to complete such education.

10. **Education Directly Related to Employment** is a Non-Core Activity. This activity is for work eligible individuals who have not received a high school diploma or a certificate of high school equivalency. It involves education related to a specific occupation, job, or job offer. The activity includes courses designed to provide the knowledge and skills for specific occupations or work settings, but may also include adult basic skills education and ESL. Where required as a prerequisite for employment by employers or occupations, this activity may also include education leading to a General Educational Development (GED) or high school equivalency certificate.

Up to one hour of **unsupervised** study time for each hour of class time may be counted towards participation requirements. **Supervised**, related study time may also be counted towards participation requirements. Total study time (including unsupervised and supervised time) counted towards participation requirements cannot exceed the hours required or advised by the particular educational program. Where the MWA opts to count study time towards participation requirements, it must obtain documentation from the educational institution stating the homework/study expectations of the program to ensure that reported participation time does not exceed those hours. For example, an individual who is enrolled in an educational program that consists of four hours per week of classroom seat time, whose

educational institution recommends three hours per week of study time per credit hour/classroom hour, may not count more than 12 total hours of study time (no more than four of which may be unsupervised) towards their participation requirement.

In order to be counted towards participation requirements, supervised study time must be supervised in a formal study hall at the MWA or the educational institution, where an MWA staff person or appropriate representative of the educational institution can verify the participant's hours of study on a timesheet.

Distance learning may be counted as part of this activity. Such time must be documented and verified as time in which progress was made, and must be in accordance with all documentation requirements specified in detail in case management PI 06-34 and changes.

Participants must also participate in the required minimum number of hours of core activities in order to meet minimum federal participation requirements.

Participants in education directly related to employment should be supervised on an ongoing basis, no less frequently than once each day in which the individual is scheduled to participate.

A standard for measuring progress should be developed by the training/educational institution in order to monitor participants' progress. Progress should be judged by mediums such as progress reports, report cards, grade point average, or a time frame within which a participant is expected to complete such education.

11. **Satisfactory Attendance at Secondary School or in a Course of Study Leading to a Certificate of General Equivalence** is a Non-Core Activity. Unlike "education directly related to employment," this activity need not be restricted to those for whom obtaining a GED is a prerequisite for employment. The activity consists of regular attendance, in accordance with the requirements of the secondary school or course of study at a secondary school; or in a course of study leading to a certificate of general equivalence, in the case of a participant who has not completed secondary school or received such a certificate. The former is aimed primarily at minor parents still in high school, whereas the latter is aimed at participants of any age.

This activity may not include other related educational activities, such as adult basic education or language instruction, unless it is linked to attending a secondary school or leading to a GED.

Up to one hour of unsupervised study time for each hour of class time may be counted towards participation requirements. Supervised, related study time may also be counted towards participation requirements. Total study time (including unsupervised and supervised time) counted towards participation requirements cannot exceed the hours required or advised by the particular educational program. Where the MWA opts to count study time towards participation requirements, it must obtain documentation from the educational institution stating the homework/study expectations of the program to ensure that reported participation time does not exceed those hours. For example, an individual who is enrolled in an educational program that consists of four hours per week of classroom seat time, whose educational institution recommends three hours per week of study time per credit hour/classroom hour, may not count more than 12 total hours of study time (no more than four of which may be unsupervised) towards their participation requirement.

In order to be counted towards participation requirements, supervised study time must be supervised in a formal study hall at the MWA or the educational institution, where an MWA staff person or appropriate representative of the educational institution can verify the participant's hours of study on a timesheet.

Distance learning may be counted as part of this activity. Such time must be documented and verified as time in which progress was made, and must be in accordance with all documentation requirements specified in detail in case management PI 06-34 and changes.

Participants must also participate in the required minimum number of hours of core activities in order to meet minimum federal participation requirements.

Participants in this activity should be supervised on an ongoing basis, no less frequently than once each day in which the individual is scheduled to participate.

A standard for measuring progress should be developed by the training/educational institution in order to monitor participants' progress. Progress should be judged by mediums such as progress reports, report cards, grade point average, or a time frame within which a participant is expected to complete such education.

PROHIBITED

In all such instances where participants are placed into any of the allowable work activities, they shall not be placed into vacancies created as of the result of layoffs, strikes, or bona fide labor disputes. While participants cannot displace employees who were involuntarily terminated due to staffing reductions, they

may fill positions that occur due to attrition, as in cases where former employees voluntarily vacated positions. Concurrence must be obtained from the union prior to placement into vacancies if there is union representation.

Action: MWAs shall comply with this policy issuance in the implementation of the JET Program.

Inquiries: Questions regarding this policy issuance should be directed to your Welfare Reform state coordinator at (517) 335-5858.

The information contained in this policy issuance will be made available in alternative format (large type, audio tape, etc.) upon special request to this office. Please contact Ms. Barbara Elkins at (517) 241-4663, for details.

**Expiration
Date:** Continuing

LEO:SS:be
Attachment

JET Allowable Activities in Meeting the Required Hours of Participation
(Applies to all Participants)

1.	Unsubsidized Employment (Core Activity, 20 hr/week minimum) <ul style="list-style-type: none"> Full- or part-time employment in the public or private sector, not supported by Temporary Assistance for Needy Families (TANF) funds or state General Fund/General Purpose (GF/GP) funds or any other public program. Hours in barrier removal or other supportive activities, such as substance abuse treatment, mental health treatment, and rehabilitation activities may count as unsubsidized employment if the activities are an integrated part of the subsidized employment and if the participant is paid for all hours of participation in such activities. Self-employment may count as unsubsidized employment. The following formula must be used to determine actual hours of participation for the self-employed: Monthly net business sales (gross revenues-expenses) divided by the federal minimum wage=total monthly hours. Guidelines for determining allowable self-employment activities and allowable self-employment expenses can be found in Department of Human Services Program Eligibility Manual 500, at http://www.mfia.state.mi.us/olmweb/ex/pem/500.pdf. 	X
2.	Subsidized Public or Private Sector Employment (Core Activity, 20 hr/week minimum) <ul style="list-style-type: none"> Job Creation through public or private sector employment wage subsidies. Work-study programs sponsored by educational institutions may be included in this activity. Hours of participation in barrier removal or other supportive activities, such as substance abuse treatment, mental health treatment, and rehabilitation activities may count as subsidized employment if the activities are an integrated part of the subsidized employment and if the participant is paid for all hours of participation in such activities. 	X
3.	On-the-Job Training (OJT) (Core Activity, 20 hr/week minimum) <ul style="list-style-type: none"> Training is conducted while participants are employed. Employer may be reimbursed for the training costs, which may cover up to 50 percent of a participant's salary. An OJT contract must be limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided. 	X
4.	Job Search and Job Readiness (JSJR) Assistance (Core Activity, 20 hr/week minimum) <ul style="list-style-type: none"> The act of seeking or obtaining employment, or preparation to seek or obtain employment. Job Readiness activities may include substance abuse treatment, mental health treatment, or rehabilitation activities if determined to be necessary by a qualified medical or mental health professional. Personal activities such as seeking childcare, seeking housing, or seeking transportation are not countable work activities under JSJR or any other allowable activity. An individual's participation in JSJR assistance can count for a maximum of 12 weeks in the preceding 12-month period, of which no more than 4 weeks may be consecutive. For the purposes of the 12-week limit, a week is defined as 20 hours for a participant who is a single custodial parent with a child under age six, and is defined as 30 hours for all other participants (240 hours single custodial parents with a child under age six, and 360 hours for all other individuals). A maximum of 360 JSJR hours per preceding 12-month period may be counted for each work eligible individual in a two-parent family. For the purposes of the four-week limit on consecutive participation in JSJR, a week is the seven-day period from Sunday through Saturday. Thus, <i>any</i> amount of time spent participating in JSJR during a week would exhaust one full week of the 4-consecutive week JSJR time limit. If an individual participates in JSJR activities for four consecutive weeks, subsequent JSJR activities may not begin to count again towards the individual's federal participation requirement until one full week after the end of the fourth consecutive week of JSJR. - Hours of participation in JSJR in fifth consecutive weeks will not be counted towards participation requirements, nor be applied towards the individual's 240/360 hour 12-month limit. JSJR hours in a month that do not satisfy participation requirements will still be applied towards the individual's total number of countable hours per twelve-month period. Participation time spent in JSJR prior to an individual becoming a FIP recipient will not count towards the participant's JSJR time limit. - 	X
5.	Work Experience Program (WEP) (Core Activity, 20 hr/week minimum) <ul style="list-style-type: none"> An unpaid work assignment, performed in return for welfare. May include work associated with the refurbishing of publicly assisted housing. No specific time limit, but intent is for short-term participation that improves skills and general employability of participants. A participant's combined monthly hours of participation in WEPs and Community Service Programs (CSPs) may not exceed the amount of cash assistance the participant receives per month divided by the state's minimum wage, in accordance with the Fair Labor Standards Act (FLSA). If the allowable monthly hours of WEP do not satisfy monthly core activity participation requirements, a core activity other than WEP or CSP must be used to meet the remainder of the core activity participation requirement. 	X
6.	Community Service Programs (CSP) (Core Activity, 20 hr/week minimum) <ul style="list-style-type: none"> CSPs must be structured programs in which individuals perform work for the direct benefit of the community under the auspices of public or nonprofit or organizations. CSPs must be designed to improve the employability of participants otherwise unable to obtain full-time employment. Time counted in CSPs may include training that is an integral, embedded part of the CSP and of limited duration. A participant's combined monthly hours of participation in CSPs and WEPs may not exceed the amount of the cash assistance the participant receives per month divided by the state's minimum wage, in accordance with the FLSA. If the allowable monthly hours 	X

of CSP do not satisfy monthly core activity participation requirements, a core activity other than CSP or WEP must be used to meet the remainder of the core activity participation requirement.	
<p>7. Provision of Childcare Services to Individuals Participating in Community Service Programs (Core Activity, 20 hr/week minimum)</p> <ul style="list-style-type: none"> • Providing childcare to individuals participating in a community service program. • This is an unpaid activity and must be a structured program designed to improve the employability of individuals who participate in it. 	X
<p>8. Vocational Educational Training (VET) (Core Activity, 20 hr/week minimum)</p> <ul style="list-style-type: none"> • Organized educational programs that prepare individuals for employment in current or emerging occupations. • Participation time in a baccalaureate or advanced degree program may be included in this activity. • Any participation time in this activity exceeding 12 months per individual shall not be counted towards federal participation requirements. • Basic and remedial education and English-as-a-Second Language (ESL) may only count as part of a VET activity if they are a minor component of the program, and deemed to be necessary by the educational institution, who must provide supporting documentation for its need. <p>A. Vocational/Occupational Training</p> <ul style="list-style-type: none"> ▪ An occupationally relevant training component, directly related to a specific occupational field or specific job, which may combine classroom, laboratory, and other related activities. ▪ Up to one hour of unsupervised study time for each hour of class time may be counted towards participation requirements. Supervised, related study time may also be counted towards participation requirements. Total study time (including unsupervised and supervised time) counted for participation cannot exceed the hours required or advised by the particular educational program. <p>B. Condensed Vocational Training (CVT)</p> <ul style="list-style-type: none"> ▪ A short-term (not to exceed six months) vocational training program requiring a minimum of 30 hours of classroom seat time per week. ▪ Up to one hour of unsupervised study time for each hour of class time may be counted towards participation requirements. Supervised, related study time may also be counted towards participation requirements. Total study time (including unsupervised and supervised time) counted for participation cannot exceed the hours required or advised by the particular educational program. <p>C. Internships, Practicums, & Clinicals</p> <ul style="list-style-type: none"> • Activities required by an academic or training institution for licensure, professional certification, or degree completion, etc. • Countable participation time is limited to the requirements of the educational institution for the associated program. 	X
<p>9. Job Skills Training Directly Related to Employment (Non-Core Activity)</p> <ul style="list-style-type: none"> • Job skills training focuses on educational or technical training that specifically helps individuals obtain employment or advance in the workplace. • Remedial ed/basic math/ESL is allowable if it relates directly to employment or job training. • Baccalaureate and advanced degree programs may be defined as Job Skills Training Directly Related to Employment. Such programs must be applicable to an occupation that the MWA has determined to be in-demand. • Up to one hour of unsupervised study time for each hour of class time may be counted towards participation requirements. Supervised, related study time may also be counted towards participation requirements. Total study time (including unsupervised and supervised time) counted for participation cannot exceed the hours required or advised by the particular educational program. 	O
<p>10. Education Directly Related to Employment (Non-Core Activity)</p> <ul style="list-style-type: none"> • Education related to a specific occupation, job, or job offer. • For work-eligible individuals who have <i>not</i> received a high school diploma or certificate of high school equivalency. • Remedial ed/basic math/ESL and GED preparation is allowable if it is related to a specific occupation, job, or job offer. • Up to one hour of unsupervised study time for each hour of class time may be counted towards participation requirements. Supervised, related study time may also be counted towards participation requirements. Total study time (including unsupervised and supervised time) counted for participation cannot exceed the hours required or advised by the particular educational program. 	O
<p>11. Satisfactory Attendance at Secondary School or in a Course of Study Leading to a Certificate of General Equivalence (Non-Core Activity)</p> <ul style="list-style-type: none"> • Activity may not include other related educational activities, such as adult basic education or language instruction unless it is linked to attending a secondary school or leading to a GED. • Up to one hour of unsupervised study time for each hour of class time may be counted towards participation requirements. Supervised, related study time may also be counted towards participation requirements. Total study time (including unsupervised and supervised time) counted for participation cannot exceed the hours required or advised by the particular educational program. 	O

X – Any single or combination of those activities identified with an “X” can be used to meet the minimum 20 required hours of participation in Core Activities.

O – Those activities marked with an “O” are considered “Non-Core Activities” and can only be used for meeting the required hours of participation after the minimum hours of Core Activity participation have been met.